



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY**

REGION 6

HAZARDOUS WASTE ENFORCEMENT BRANCH

1445 Ross Avenue

Dallas, Texas 75202

January 12, 2011

MEMORANDUM

SUBJECT: Gulfco Marine Maintenance Superfund Site
Comments on Draft Engineering Evaluation/Cost Analysis, Prepared by EA
Engineering, Science, and Technology, Inc. for EPA

FROM: M. Gary Miller, P.E.
Arkansas/Texas Section (6SF-RA)

TO: Carlos Sanchez, Chief
Arkansas/Texas Section (6SF-RA)

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated December 2010. The comments below will be provided to EA Engineering to prepare a revised Engineering Evaluation/Cost Analysis Report.

Comments:

1. (Page 1, Section 1): The EE/CA discusses the former surface impoundments, North Area surface soils, North Area surface water, and Intracoastal Waterway sediments. According to the Task Order requirements, the EE/CA should only address the former surface impoundments and the wetlands sediments. However, EPA will retain this information at this time and will evaluate the technical merits of the information and reassess at a future date.
2. (Page 3, Section 1): The EE/CA states that no further action is necessary based on the ecological assessment, but that it may be beneficial from a risk management standpoint to remove some or all of the sediments from the potentially impacted areas. The EE/CA does not explain when it may be beneficial to remove these sediments, and other statements lead to the opposite conclusion. For example, the EE/CA finds that the Site wetlands are not visually distinguishable from surrounding wetlands in terms of species composition and density, presence of invertebrates, and wildlife usage. Further, the EE/CA states that any disturbance of the wetlands, such as excavation of sediments or other remedial activities would require decades for the sediments to return to the marsh type environment present today, which provide

valuable functions such as wildlife habitat, food, water quality enhancement, and ground water recharge. The EE/CA should be revised to resolve these discrepancies.

3. (Page 3, Section 1): The alternatives summary includes several alternatives with a gravel drive installed on top of the former impoundments. Access to the top of the former impoundments is not required except for mowing, and the presence of a drive may encourage driving on the cap, which in the long term may result in rutting. The EE/CA should state why the gravel drive is included.
4. (Page 3, Section 1): A fence around the former impoundments is not included in the alternatives summary. A fence around the former impoundments is necessary to prevent access and protect the integrity of the cap. A fence around the former impoundments, including appropriate signs, should be added to the alternatives.
5. (Page 5, Section 2): The EE/CA describes the data presented in Appendix A as a “BERA” (Baseline Ecological Risk Assessment). A streamlined ecological risk evaluation should be completed as part of the EE/CA, and all references to a BERA should be changed to a streamlined ecological risk evaluation.
6. (Page 8, Section 3.1.1): The EE/CA states that a total of six surface soil samples were collected (0-6 inches bgs) in addition to the reference samples. However, there were in fact 14 locations in the North Area soil that were sampled from 0-6 inches bgs. Further, there were additional shallow soil samples in the scrap metal area and the debris pile area. Finally, there were 17 sediment samples collected from 0-6 inches in the wetland sediment areas. The EE/CA should be revised to accurately describe the soil and sediment samples collected.
7. (Page 13, Section 4.2, first paragraph, last sentence): The word "PRP" should be inserted between the words "additional" and "data".
8. (Page 14, Section 6.1): The EE/CA states that existing site conditions indicate the need for some form of removal as discussed in Section 4 above. However, Section 4 discusses why sediment removal is not warranted. Also, later in Section 6.1, the EE/CA states that “while removal action may not be warranted to address ecological exposure pathways ...” Further, in Section 1, the EE/CA states that no further action is necessary based on the ecological assessment. The EE/CA should be revised to resolve these discrepancies.
9. (Page 14, Section 6.1): The EE/CA states that a BERA is currently undergoing EPA review. The draft BERA is currently being prepared and is not yet undergoing EPA review. This sentence should be revised to state that a BERA is currently being prepared.
10. (Page 15, Section 6.2): The EE/CA included ARARs regarding drinking water standards. The ground water at the Site is salt water and therefore the drinking water standards are not applicable or relevant. The ARARs regarding the drinking water standards should be removed.

11. (Appendix A, Page 13, Section 3.2.3): This section discusses results of the *L. plumulosus* toxicity tests. The first paragraph states that there is no statistical difference between the seven site samples and the two reference samples for either the survival or growth endpoints. Yet, the subsequent two paragraphs contradict this finding. The EE/CA should be revised to resolve this discrepancy.

cc: Barbara Nann